## REMARKS

The above amendments to the above-captioned application along with the following remarks are being submitted as a full and complete response to the Official Action dated November 21, 2007. In view of the above amendments and the following remarks, the Examiner is respectfully requested to give due reconsideration to this application, to indicate the allowability of the claims, and to pass this case to issue.

Status of the Claims

Claims 1-13 are under consideration in this application. Claims 1, 3-4, 6-7 and 10 are being amended, as set forth above and in the attached marked-up presentation of the claim amendments, in order to more particularly define and distinctly claim Applicants' invention. Claims 11-13 are being added.

All the amendments to the claims are supported by the specification. Applicants hereby submit that no new matter is being introduced into the application through the submission of this response.

Prior Art Rejection

Claims 1-10 were rejected under 35 U.S.C. §103(a) as being unpatentable over Japanese Patent No. 408134692 (hereinafter "JP '692"). This rejection has been carefully considered, but is most respectfully traversed in view of the claims currently on file, as more fully discussed below.

The process for producing a display (Figs. 3-4) having a second substrate 5 with a phosphor layer formed on a surface thereof, and a first substrate 3 disposed opposing to said second substrate and having electron guns formed thereon, said electron guns having a structure of: a first conductive film laminated on the first substrate – an insulating film – a second conductive film (MIM; Fig. 2), comprises: forming the insulating film into a tunneling insulator 14 of said electron guns (p. 3, lines 9-11) by anodizing said first conductive film formed as an electrode 12 of said electron guns (p. 9, lines 6-7) with a non-aqueous electrolyte containing one of (1) an organic solvent having an alcoholic hydroxyl group (claim 1), (2) an aprotic organic solvent (claim 4), and (3) a mixed solvent comprising an organic solvent having an alcoholic hydroxyl group and an aprotic organic solvent (claim 7), and at least one solute selected from salts of organic carboxylic acids containing not more

than 2 alcoholic hydroxyl groups. The electrolyte contains water at 3-15% by weight ("*The water content is ... most preferably 3 to 15% by weight.*" p. 15, lines 9-14).

In contrast, JP '692 only provides its coating/insulation film in an electrolytic condenser, an electric capacitor, etc. ([0001]) for insulating any current from passing there through, but not as "a tunneling insulator of said electron guns" of the present invention which utilizes the tunnel phenomenon to have electric current pass there through.

In particular, JP '692's coating film has a large relative dielectric constant of 20 or more, preferably 30 to 90, to attain a sufficient insulation property (see Example 1 in [0015]), such a range of dielectric constant would inhibit the tunneling effect of the present invention. On the other hand, the present invention provides a nonlinear element in which electric current is flown by applying high electric field with a polarity arrangement reverse to that in the anodization utilizing the tunnel phenomenon.

In addition, JP '692 does not use "a non-aqueous electrolyte containing at least one solute selected from salts of organic carboxylic acids containing not more than 2 alcoholic hydroxyl groups" as the present invention. JP '692 only uses inorganic oxo acid salt (claims 1-4; [0010]), but not "salts of organic carboxylic acids containing not more than 2 alcoholic hydroxyl groups" as recited in claims 1, 4 & 7. Thus, the electrolyte used in the present invention is clearly different from that used in JP '692 .

Regarding new claims 11-13, said first conductive film is anodized at a current density of 1 μ to 1 $mA/cm^2$ and a formation voltage of 0.1 to 20 V (p. 16, lines 19-20). JP' 692 aims to obtain an anodized film having a high dielectric constant (claim 1). For this purpose, anodization is effected at a current density of 5 $mA/cm^2$ and a voltage of 25-60 V in JP '692 ([0014]-[0020]), which are clearly different from preferred ranges of the present invention (i.e., 1 μ to 1 $mA/cm^2$ and 0.1 to 20 V).

Applicants contend that JP '692 fails to teach or suggest each and every feature of the present invention as recited in independent claims 1, 4 and 7. As such, the present invention as now claimed is distinguishable and thereby allowable over the rejections raised in the Office Action. The withdrawal of the outstanding prior art rejections is in order, and is respectfully solicited.

Conclusion

In view of all the above, clear and distinct differences as discussed exist between the present invention as now claimed and the prior art reference upon which the rejections in the Office Action rely, Applicants respectfully contend that the prior art references cannot anticipate the present invention or render the present invention obvious. Rather, the present invention as a whole is distinguishable, and thereby allowable over the prior art.

Favorable reconsideration of this application is respectfully solicited. Should there be any outstanding issues requiring discussion that would further the prosecution and allowance of the above-captioned application, the Examiner is invited to contact the Applicants' undersigned representative at the address and telephone number indicated below.

Respectfully submitted,

Stanley P. Fisher
Registration Number 24,344

Juan Carlos A. Marquez
Registration Number 34,072

**REED SMITH LLP**
3110 Fairview Park Drive, Suite 1400
Falls Church, Virginia 22042
(703) 641-4200

**February 13, 2008**

SPF/JCM/JT